

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Allied Pilots Association,
Plaintiff,

v.

American Airlines, Inc.,
Defendant.

Civil Action No. 4:22-cv-00315-O

**PLAINTIFF ALLIED PILOTS ASSOCIATION'S
MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff Allied Pilots Association (“APA”) hereby moves this Court for a preliminary injunction to enjoin Defendant American Airlines, Inc. (“American”) from scheduling any pilots other than Check Airmen as substitute crew members (“seat fillers”) for Line Operational Evaluation (“LOE”) sessions in a flight simulator without first exhausting the dispute-resolution processes applicable to major disputes under the Railway Labor Act (“RLA”). 45 U.S.C. §§ 151-188. American’s unilaterally announced plan to schedule line pilots as LOE seat fillers alters the working conditions for its pilots and thus violates the RLA’s Section 2, Seventh, and Section 6. 45 U.S.C. § 152, Seventh, § 156. It is thus due to be enjoined until a final judgment issues in this case. The law and facts supporting this Motion are set forth in the brief and appendix filed both in support of this Motion and in support of APA’s Response in Opposition to American’s Motion to Dismiss.

Date: April 25, 2022

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** Admitted Pro Hac Vice*

CERTIFICATE OF CONFERENCE

On April 21, 2022, Joshua B. Shiffrin, counsel for Plaintiff Allied Pilots Association (“APA”), conferred with Mark W. Robertson, counsel for Defendant American Airlines, Inc. (“American”), via telephone, about APA’s then-forthcoming Motion for a Preliminary Injunction. Mr. Robertson indicated that American opposed APA’s Motion for the reasons set out in American’s Motion to Dismiss as well as because it contends that the APA has not satisfied any of the requirements for preliminary injunctive relief.

Dated: April 25, 2022

/s/ Sanford R. Denison
SANFORD R. DENISON

CERTIFICATE OF SERVICE

I certify that on April 25, 2022, a true and correct copy of the foregoing document was served on counsel of record for all parties via the Court's ECF system.

DATED: April 25, 2022

/s/ Sanford R. Denison
SANFORD R. DENISON